

DCID 1/19 COMMENTS

1. Para. 1.a. Document: Delete "working notes and papers" as this represents a format for each material type. Include "film".
Add at end of sentence: "including working material formats of the foregoing." ✓
2. Para. 2. General: (Line 48). It is assumed that "binding contractual obligations on those granted access" refers to the individual signatures on the NdAs. If this is so we recommend the wording be more precise and so state. ✓
3. Para. 3. Need-To-Know Policy: Current wording regarding need-to-know determination by the "authorized holder" requires clarification. ✓
4. Para. 5. NdAs: There was a unanimous recommendation that "an NdA" be changed to "The NdA" and that Form 4193 be the only authorized NdA to be used by participating NFIB Agencies, prohibiting alternative forms. A single NdA should suffice for any and all accesses by an individual. Further, the "failure to sign" provision (Line 18) should include a time factor to permit the individual to examine the form prior to completion (i.e., 30 days) prior to revocation of existing SCI accesses.

There is general disagreement as to who can brief or debrief and who is authorized to witness the form. Must it be a duly authorized agent of the government? Recommend this be positively stated.

(Line 28) Reference to the informal questions and answers document of July 1981 appears out of context in a DCID. Further, some interpretations of this document sustain that it was the intent of the NdA form to be executed only once per individual. This would, of course, invalidate a myriad of alternative forms.
5. Para. 7. Access Approvals: Suggest that the words "in the 4C system" be added at the end of the sentence. ?
6. Para. 7.b.(1) (d): It was a consensus that a simple statement that a collateral clearance may not qualify for SCI access would clarify the sentence.
7. Para. 8: It is recommended that terminology ^{be used} to the effect that all agencies will honor the basis for another agency granting an SCI clearance and not require additional investigative or adjudicative process. If not - why bother to record in a central file? ?
8. Para. 10, Page 14, Line 38: We are pleased to see a logical further definition of "casual contacts".
9. Para. 13: We highly recommend adoption of the NSA member wording. NA
10. Para. 14, Line 4: Recommend delete "also".

11. Para. 17, Line 38: Concern was voiced regarding possible conflict between this document when published and NSA/CSS Manual 90-5. ?
12. Para. 21: There was a high level of concern over the requirements of this paragraph as written. However, the group was briefed as to the current wording of the replacement to E.O. 12065, and assumed that the Intelligence Community will opt to not portion mark if the elective provision remains when the E.O. is published; therefore, comments would be superfluous. However, we do agree with the current community policy that portion marking is impractical in intelligence documentation. ?
Recommend the words "UPON NOTIFICATION OF ORIGINATOR" be substituted for "ORIGINATING AGENCY'S DETERMINATION". The latter phrase appears to demand a determination at origination. ✓
13. Para. 33.a., Lines 42 to 44: There was general concern over the wording in regard to the double standards for couriering in the D.C. area vs. the rest of the U.S.A. It would appear that vulnerability would be more severe in D.C. rather than less. ?
14. Para. 33, b., Line 14: Recommend rewording to "each side of the inner wrapped package only" for clarity. ✓
15. Para. 35, Line 8: Recommend reword to "SIOs may impose more stringent requirements when deemed necessary." ✓
16. Para. 35.d., Line 30: Recommend delete this sentence as it is more properly covered in Para. 50, Inspection Policy.
17. Para. 35.e.: Recommend that a more precise philosophy be developed and guidelines provided. This paragraph is subject to wide interpretation and application, possibly to the detriment of the system. Inspection results are not centrally recorded, also inspections are not standard or are the results consistent. ?
18. Para. 48.c.: Again, we are concerned with multiple forms and formats to accomplish like jobs. We highly recommend that a standard single form be developed for mandatory use by the community.
19. Para. 50., Line 27: Add "for a period of _____ years." ?
This will assist in implementing Para. 35.e.
20. Para. 50, Lines 28 and 29: Recommend rewording "the cognizant NFIB organization inspection reports of joint SCIFs shall be accepted by any other NFIB organization" etc. This is considered necessary to avoid duplication of inspection efforts and resultant non-productive time that could result from leaving the acceptance optional. ?

GENERAL COMMENT: There is a general lack of understanding regarding the definitions of a SCIF. In parts of the DCID SCIF refers to a SCI facility, in other areas it refers to an SCI control facility. ?
Recommend that the terminology either be standardized or that an additional definition be added to clarify the difference between a "facility" and a "control facility".